

**EXHIBIT 1**  
**(DECLARATION)**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re: Prehired, LLC

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Joshua Jordan

Appellant,

v.

State of Washington et al,

Appellee.

Civil Action No. 1:24-cv-01181-MN

Bankruptcy Case No. 22-11007-JTD

Bankruptcy BAP No. 24-64

**DECLARATION OF SUSANA CROKE IN SUPPORT OF THE STATE OF  
WASHINGTON'S MOTION FOR EXTENSION OF TIME TO APPEAR**

I, **Susana Croke**, declare under penalty of perjury that the following is true and correct:

1. I am an Assistant Attorney General in the Consumer Protection Division of the Washington State Attorney General's Office. I am one of the attorneys of record for the Appellee State of Washington in the above-captioned matter. I am licensed to practice law in the State of Washington and am an active member in good standing of the WSBA.
2. I make this declaration with personal knowledge.
3. I am familiar with the policies and procedures of the Consumer Protection Division and contracting of outside counsel for Washington Attorney General's Office.
4. To represent the State of Washington, outside counsel must be engaged as a Special Assistant Attorney General (SAAG) in Washington. The process of engaging and appointing a SAAG requires several layers of management

approval.

5. Upon learning of the requirement to associate with local counsel, I began the process of identifying potential local counsel by obtaining referrals and reviewing qualifications.
6. I have identified prospective local counsel for this matter, and we are in the initial stages of discussions about an engagement.
7. I still need upper management approval to engage local counsel, including approval of a budget. Actual contracting will also take several days to complete.
8. Based on my experience in prior SAAG engagements, I believe the State needs additional time to complete the contracting process beyond the current deadline of November 21, 2024.
9. On November 13, 2024, I emailed Mr. Jordan to inform him that the State would be requesting a 30-day extension of time to appear to finalize engagement of local counsel and appear *pro hac vice* and asked him to inform me if he objected to this request. Mr. Jordan responded the same day saying he agreed to the State's 30-day extension with the understanding that no further extensions would be requested.

I declare, under penalty of perjury that the foregoing is true and correct.

Dated: November 15, 2024

/s/ Susana Croke  
SUSANA CROKE